

1 WILLIAM A. ISAACSON (*Pro Hac Vice*)
2 (wisaacson@bsfllp.com)
3 STACEY K. GRIGSBY (*Pro Hac Vice*)
4 (sgrigsby@bsfllp.com)
5 NICHOLAS A. WIDNELL (*Pro Hac Vice*)
6 (nwidnell@bsfllp.com)
7 BOIES, SCHILLER & FLEXNER LLP
8 1401 New York Ave NW, Washington, DC 20005
9 Telephone: (202) 237-2727; Fax: (202) 237-6131

10 RICHARD J. POCKER #3568
11 (rpocker@bsfllp.com)
12 BOIES, SCHILLER & FLEXNER LLP
13 300 South Fourth Street, Suite 800, Las Vegas, NV 89101
14 Telephone: (702) 382-7300; Fax: (702) 382-2755

15 DONALD J. CAMPBELL #1216
16 (djc@campbellandwilliams.com)
17 J. COLBY WILLIAMS #5549
18 (jcw@campbellandwilliams.com)
19 CAMPBELL & WILLIAMS
20 700 South 7th Street, Las Vegas, Nevada 89101
21 Telephone: (702) 382-5222; Fax: (702) 382-0540

22 *Attorneys for Defendant Zuffa, LLC, d/b/a*
23 *Ultimate Fighting Championship and UFC*

24 Cung Le, Nathan Quarry, Jon Fitch, Brandon
25 Vera, Luis Javier Vazquez, and Kyle
26 Kingsbury on behalf of themselves and all
27 others similarly situated,

28 Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**ZUFFA, LLC'S FIRST UNOPPOSED
MOTION TO EXTEND TIME TO
OPPOSE PLAINTIFFS' MOTION TO
CHALLENGE ATTORNEY-CLIENT
PRIVILEGE (ECF NO. 320)
(First Request)**

Pursuant to Federal Rule of Civil Procedure 6(b) and District of Nevada Local Rule IA 6-1(a), Defendant Zuffa, LLC (“Zuffa”) hereby files this motion for an extension of time of four days to oppose Plaintiffs’ Motion to Challenge Attorney-Client Privilege (ECF No. 320) (“Plaintiffs’ Motion”). Zuffa’s opposition to Plaintiffs’ Motion is currently due on Thursday, December 29, 2016. With the four-day extension, Zuffa’s opposition would be due on January 3, 2017. This is Zuffa’s first motion or stipulation to extend time to oppose Plaintiffs’ Motion. Declaration of Stacey K. Grigsby in Support of Zuffa, LLC’s First Unopposed Motion to Extend Time to Oppose Plaintiffs’ Motion to Challenge Attorney-Client Privilege (“Grigsby Declaration”) ¶ 4. On December 27, 2016, counsel for Zuffa contacted counsel for Plaintiffs in writing regarding their position on Zuffa’s request for a four-day extension, and Plaintiffs’ counsel indicated that they would not oppose this request. Grigsby Decl. ¶ 9.

This request for an extension of time is necessitated by a number of urgent deadlines that require counsel’s immediate attention, as well as counsel’s various commitments around the intervening major holidays. Plaintiffs’ Motion was filed on December 15, 2016. *Id.* ¶ 3. Zuffa’s Opposition is due on December 29, 2016. *Id.* ¶ 5. Plaintiffs’ Reply is due on January 5, 2017. *Id.* ¶ 7. Zuffa moved to seal confidential and privileged information in Plaintiffs’ Motion on December 19, 2016. *Id.* ¶ 6. This briefing schedule encompasses two major holidays, and counsel for Zuffa is short-staffed due to prior holiday plans of the attorneys and their support staff in their offices. As a result, counsel needs a short extension of time to file the opposition to Plaintiffs’ Motion and believes that good cause exists to extend the briefing schedule by only four days. *Id.* ¶ 8.

With the New Year’s Day federal holiday to be observed on Monday, January 2, the altered briefing schedule would result in Zuffa’s Opposition being due on Tuesday, January 3, 2017 and Plaintiffs’ Response due on Tuesday, January 10, 2017. *See Fed. R. Civ. P. 6(a)(1)(C).*

1 Dated: December 27, 2016

BOIES, SCHILLER & FLEXNER LLP

3 By: /s/ Stacey K. Grigsby

4 Stacey K. Grigsby

5 Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC

6 William A. Isaacson (*Pro Hac Vice*)
7 Stacey K. Grigsby (*Pro Hac Vice*)
Nicholas A. Widnell (*Pro Hac Vice*)
8 BOIES, SCHILLER & FLEXNER LLP
1401 New York Ave NW
Washington, DC 20005
Tel: (202) 237-2727
Fax: (202) 237-6131
Email: wisaacson@bsflpp.com
sgrigsby@bsflpp.com
nwidnell@bsflpp.com

13 Donald J. Campbell #1216
J. Colby Williams #5549
14 CAMPBELL & WILLIAMS
700 South 7th Street
15 Las Vegas, Nevada 89101
Tel: (702) 382-5222
Fax: (702) 382-0540
Email: djc@campbellandwilliams.com
jcw@campbellandwilliams.com

19 Richard J. Pocker #3568
20 BOIES, SCHILLER & FLEXNER LLP
300 South Fourth Street, Suite 800
21 Las Vegas, NV 89101
Tel: (702) 382-7300
Fax: (702) 382-2755
Email: rpocker@bsflpp.com

24 Attorneys for Defendant Zuffa, LLC, d/b/a Ultimate
Fighting Championship and UFC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Zuffa's First Unopposed Motion To Extend Time To Oppose Plaintiffs' Motion To Challenge Attorney-Client Privilege (ECF No. 320) was served on the 27th day of December, 2016 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Kim
An Employee of Boies, Schiller & Flexner LLP